

IN THE CIRCUIT COURT OF
LAWRENCE COUNTY, OHIO

CARL G. SIMPSON AND BONNIE REED
SIMPSON, CO-ADMINISTRATORS
OF THE ESTATE OF CARL D. SIMPSON,

COPY

Plaintiffs,

vs.

Case No. C-1-00-0014

INTERMET CORPORATION, ET AL.,

Defendants.

DEPOSITION OF ROGER RAMEY, SR.

The deposition of Roger Ramey, Sr., was taken on
November 2, 2001, at the approximate hour of 9:20 a.m., at
215 South Fourth Street, Ironton, Ohio.

ELITE COURT REPORTING
13 Carriage Way
Hurricane, West Virginia 25526
(304) 757-1122

BRANDY D. FRAZIER

Appearances:

Randall L. Lambert
 D. Scott Bowling
 Attorneys at Law
 Lambert, McWhorter & Bowling
 Post Office Box 725
 Ironton, OH 45638

Patricia Anderson Pryor
 Attorney at Law
 Taft, Stettinius & Hollister
 425 Walnut Street
 Cincinnati, OH 45202-3957

Nancy J. Bride
 Attorney at Law
 Greenebaum, Doll & McDonald
 255 East Fifth Street
 Cincinnati, OH 45202-4728

Robert A. Flaughner
 Attorney at Law
 Lane, Alton & Horst
 175 South Third Street
 Columbus, OH 43215-5100

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None

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1 A. Yes, sir.

2 Q. And you held that position until your last date
3 with the plant?

4 A. That is my recollection. They never did demote
5 me or nothing.

6 Q. In fact, around September 21st, '99, you had been
7 offered even a position that would be above the area
8 manager of the I-beam?

9 A. Yes, sir.

10 Q. What was that position again that you were
11 offered?

12 A. It was second shift superintendent. I was over
13 all operations of the plant on second shift.

14 Q. Why did you turn that down?

15 A. Well, I've got kids in baseball, and I didn't
16 want my evenings tied up in there when I had a day-turn
17 job. I just wanted to spend my time with my family.

18 Q. I know we've had some approximate years as to
19 when you were in different positions. How long would you
20 have been in a supervisory position with Iron-ton Iron? Can
21 you tell us approximately how long that lasted?

22 A. I'm trying to remember when I took it. I'd been
23 offered it on two different occasions and turned it down.
24 Then I took it on this occasion. I'm going to say two

1 years. I ain't 100 percent sure on that. It might have

2 been a year and so many months. I ain't 100 percent sure.

3 Q. About two years then?

4 A. I'm gingo to say approximately two years.

5 Q. Now, let me make sure we're clear. About two
6 years, you were area manager, or two years you were
7 supervisory --

8 A. Two years, supervisory. I was a supervisor there
9 a total -- I'm going to say approximately, now, two years.
10 Now, I don't know 100 percent on that.

11 Q. That's fine. Out of that two years, how much of
12 that were you area manager? In other words, how long did
13 it take you to --

14 A. I'm going to say I held the area manager job
15 three months.

16 Q. So a supervisor about two years and area manager
17 the last three months?

18 A. That's approximate.

19 Q. I understand. That's what I said, "about." Back
20 when you were an operator of the Sutter machine -- let's go
21 back, now. I wanted to get that timeline. We're going to
22 back up to when you became an operator of the Sutter
23 machine. Did you receive any training on the
24 tagout/lockout procedures?

1 A. Not individually. We had group meetings. We had
2 what you want to call safety meetings that showed you
3 films. You signed off on them films, and you went back
4 down there and went to work.

5 Q. How often was that?

6 A. Well, we had monthly safety meetings. Now, to go
7 over how many times I seen the same lockout/tagout, I
8 couldn't tell you.

9 Q. It was not involved in each monthly safety
10 meeting?

11 A. No, sir.

12 Q. As I understand, they were, like, on a rotating
13 basis. They had different things they would talk about.

14 A. Yes, sir.

15 Q. Would the tagout/lockout had been talked about
16 more than once a year, you think?

17 A. I'd say, yes. It was probably covered two or
18 three times a year.

19 Q. How long would these safety meetings last?

20 A. However long it took to show a film and then sign
21 off on it. You might be in there 10 minutes. You might be
22 in there 20 minutes. It varied. You didn't have a
23 guaranteed time limit. They allowed you 30 minutes to show
24 it and get everybody back to work.

1 Q. Would 10 to 20 minutes be a good average,
2 somewhere in there?

3 A. I'd say 15 minutes would be a good average on
4 every movie.

5 Q. The movie on the -- did you see a movie on
6 tagout/lockout?

7 A. Yes, sir.

8 Q. Was that the same movie? Did you see more than
9 one, in other words?

10 A. Well, that's hard to answer because I probably
11 seen the same one five times and maybe the next one five
12 times. If you seen one at the beginning of the year,
13 that's the same one you seen all year.

14 Q. That's what I mean. On the tagout/lockout, was
15 it only one movie that they showed?

16 A. Not through the whole time I worked there, now.
17 I seen different ones. But I'm going to say -- I'm safe to
18 say that if I went in on January and seen a lockout/tagout
19 movie, that following June, it was the same movie.

20 Q. Was the tagout/lockout -- was the movie ever
21 specific to the Sutter machine itself?

22 A. No, sir.

23 Q. So it was just tagout/lockout, in general?

24 A. Yes, sir.

1 everything. You can see the box -- it's the same picture,
2 all the way over in the corner over there. That is what
3 you want to call transferred in. That is in toward the
4 operator. Then it will come out to blow. Well, when that
5 machine cycled out to come out to make that blow, make that
6 limit, go up and blow, it ended up in the position B-2 is
7 in. It broke. There's a pin that rides on an air cylinder
8 that's got a trolley car right there that moves that back
9 and forth. And that pin broke. And that pattern rolled --
10 it didn't roll out that far, but it rolled out to the area
11 where the B-2 pattern is sitting right now (indicating).

12 Q. This is on the opposite side of the machine where
13 the helper and operator generally stand; is that correct?

14 A. No. This is the outside of the machine. The
15 operator and helper stand back toward where the pattern is
16 setting on B-1.

17 Q. Right. So the pattern in the Tom Slaughter
18 incident was on the --

19 A. Toward the gangway. It was on -- if you were
20 walking into the I-beam and you looked straight at the
21 machines, you didn't see the operator. It was in the exact
22 position that the B-2 Sutter box is in right now with the
23 exception of three or four foot. I mean, it didn't come
24 all the way out that far (indicating).

1 tubes. Well, when it brought it up, he had his finger in
2 one of them holes, and that blow tube caught his finger and
3 peeled it back.

4 Q. Was Tom Slaughter an operator, or was he on the
5 clean-up crew?

6 A. No. He was an operator of the A-1 Sutter machine
7 at the time of the accident.

8 Q. Did his accident have anything to do with
9 restarting the machine, manually, by the manual overdrive
10 valve?

11 A. No. His was on the squeeze part of it. But the
12 squeeze, yes, it's got a manual override valve, too. All
13 of them did.

14 Q. Was anyone pressing the manual override button at
15 the time when he --

16 A. No. The machine wasn't locked out.

17 Q. But no one was using the manual override button?

18 A. No.

19 Q. Was this during a normal operation cycle he was
20 doing this?

21 A. Well, what it was, was it just broke that pin.
22 He went out there to shove it in and forgot to turn the
23 power off on it.

24 Q. So he forgot? I mean, he should have turned the

1 Q. Which is not on the same side as where the
2 operator and helper normally stand?

3 A. No.

4 Q. So the pattern is back here. What did Tom
5 Slaughter do?

6 A. He came around the machine and went to shove that
7 pattern back in to put a new transfer pin in to keep it
8 running. Well, this blow plate -- you'll see this plate on
9 top of this pattern right here.

10 Q. That's right above where --

11 A. It's a shiny aluminum box. Well, if you see them
12 bolts sticking down on the B-2 blow chamber right there,
13 that piece bolts to that piece (indicating).

14 Q. Okay.

15 A. You can't see it -- I don't know if you've got
16 another picture here. It's showing it out there in that
17 position. You don't have any.

18 I'll try to refer to Picture 14 in explaining it.
19 At the corner of the box right there, you'll see the blow
20 tubes sticking down. Well, if you refer back to 15, to
21 where that box is in that out position, where that blow
22 plate is bolted up like it is in Picture 14, he shoved the
23 box back in towards the operator. And when it made a
24 limit, it brought that box up to meet with those blow

1 power off?

2 A. Yes. If they'd have been enforcing the lockout
3 procedure, it wouldn't --

4 Q. But he knew. I mean, he knew about the lockout
5 procedure, didn't he, to your knowledge?

6 A. Well, at the time, I didn't.

7 Q. You didn't know about the lockout procedure at
8 that time?

9 A. I mean, I wasn't an operator. I was working on
10 the clean-up crew.

11 Q. After that injury, though, I think you testified
12 that Dave Johnson was the area manager and he met with you
13 guys and reinforced the fact that it needed to be locked
14 out when you were working on the machine like that?

15 A. Well, he didn't really -- I don't know if you
16 want to call it enforcing it. He took us in a meeting and
17 talked about it and, you know, told us that these machines
18 were dangerous, to be careful in them. He didn't want to
19 read in a book later on and read about an incident that
20 he's had to read about. I mean, we didn't go in for no
21 lockout/tagout safety meeting, no. But all he done was
22 told us -- you know, he went over the fact that if the
23 machine had been -- if the power had been turned off and
24 the locks been on it, Tom wouldn't have gotten his finger